

EXHIBIT 6

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK NWAUZOR,)	
FERNANDO AGUIRRE-URBINA,)	
individually and on behalf of)	
all those similarly situated,)	
)	
Plaintiffs/Counter-Defendants.)	
)	
vs.)	NO. 3:17-CV-05769-RJB
)	
THE GEO GROUP, Inc.,)	
)	
Defendant/Counter-Claimant.)	

DEPOSITION UPON ORAL EXAMINATION OF CHRISTINA WELLS

Monday, December 16, 2019
Tumwater, Washington

NWAUZOR vs GEO GROUP
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1 there?

2 **A No.**

3 Q When you say they voluntarily asked to be there, have they
4 exercised their own self-determination and asked to live at
5 these residential facilities, or has their personal care
6 guardian made that decision for them?

7 MS. BRENNEKE: Object to the form.

8 **A It depends on the individual.**

9 Q (By Ms. Mell) So there are individuals who can't make an
10 independent living decision on their own, so they defer to
11 their personal guardian?

12 **A Yes.**

13 Q And there are individuals who are court-ordered to be at
14 Fircrest, Rainier, Lakeland Village, or Yakima Valley
15 School?

16 **A No.**

17 Q All of the individuals have, by way of their guardian or
18 themselves, chosen to be there?

19 **A Yes.**

20 Q They can leave at any time?

21 **A Yes.**

22 Q So why are those individuals not paid minimum wage for work
23 they do for the State?

24 MS. BRENNEKE: Object to the form.

25 **A It depends on what job they're doing. And there's an**

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1 assessment process that's in place to determine what level
2 of ability they have, and then they've gone through the
3 subminimum wage certificate that's required for now, and so
4 we complete our assessment, and it's all part of their
5 treatment plan.

6 Q What do you mean it's part of their treatment plan?

7 A Every individual has a team that gets together and
8 assesses, which includes the client and their guardian.
9 And then they determine what their needs are and what we're
10 going to work on while they're with us and how to help them
11 become more independent so that eventually they can move to
12 a lesser restrictive environment.

13 Q How many people are living in Fircrest?

14 A For the facility as a whole? We have -- so Fircrest is
15 separated into two program area teams. We have a nursing
16 facility team side and an intermediate care facility side.
17 We have about 110 individuals on our nursing facility. We
18 have about 108 on our intermediate care facility side.
19 What does work out? 218.

20 Q What makes a person eligible to stay in the nursing or the
21 intermediate care side of Fircrest?

22 MS. BRENNEKE: Object to the form.

23 A For the intermediate care facility side, they have to meet
24 what is under our Code of Federal Regulations, that they
25 would have to meet a certain set of criteria. They'd have

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C E R T I F I C A T E

I, DIXIE J. CATTELL, the undersigned Registered Professional Reporter and Washington Certified Court Reporter, do hereby certify:

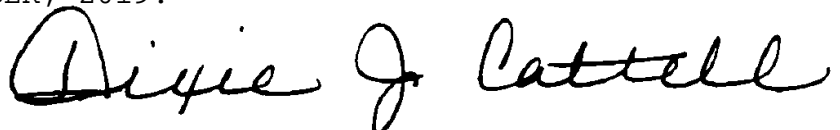
That the foregoing deposition of CHRISTINA WELLS was taken before me and completed on the 16th day of December, 2019, and thereafter transcribed by me by means of computer-aided transcription; that the deposition is a full, true and complete transcript of the testimony of said witness;

That the witness, before examination, was, by me, duly sworn to testify the truth, the whole truth, and nothing but the truth, and that the witness reserved signature;

That I am not a relative, employee, attorney or counsel of any party to this action or relative or employee of such attorney or counsel, and I am not financially interested in the said action or the outcome thereof;

That I am herewith securely sealing the deposition of CHRISTINA WELLS and promptly serving the same upon MS. JOAN MELL.

IN WITNESS HEREOF, I have hereunto set my hand this 18th day of DECEMBER, 2019.



Dixie J. Cattell, RPR, CCR
NCRA Registered Professional Reporter
Washington Certified Court Reporter CSR#2346